

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Artis C. Carroll, JR.

(In the space above enter the full name(s) of the plaintiff(s).)

16 1406

**- against -
Millersville University of
PA, Et Al.**

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

**Lancaster County of
PA, Et Al.**

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

FILED

APR 01 2016

**MICHAEL E. KUNZ, Clerk
By: [Signature] Dep Clerk**

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Artis Carroll

7044 Greenwood Ave

Upper Merion

PA 19082

610 - 701 - 1782

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Millersville University of PA
 Street Address 1 South George Street
 County, City Lancaster, Millersville
 State & Zip Code PA, 17551

Defendant No. 2

Name Lancaster County of PA
 Street Address 50 North Duke Street
 County, City Lancaster, Lancaster City
 State & Zip Code PA, 17602

Defendant No. 3

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions

☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

14th Amendment, 6th Amendment, 5th Amendment,
1st Amendment, FERPA, fraud, False imprisonment,
Defamation, Discrimination

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship N/A

Defendant(s) state(s) of citizenship N/A

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur?

Millersville, PA 17551
and Lancaster City. Both Lancaster County.

B. What date and approximate time did the events giving rise to your claim(s) occur?

Fall 2014
through Spring 2015 and Fall 2015 through
present. Millersville then Lancaster County

C. Facts:

Carroll was subjected to racial discrimination at millersville university Fall 2014. The University did not investigate his complaint. Carroll began to ask for his Student Records when his instructor (2) committed Academic Fraud. His instructor and the University denied him access to his records for 5 months giving less than half of the records demanded. The University gave Carroll a Fraudulent Disciplinary Record 02/19-05/01 (2015), and suspended him on 03/27 (2015) without/ before a Hearing because he is asking for his Student Records. Lancaster County Judge and Assistant District Attorney, as well as Public Defenders Office all are acting in bad faith. Arthur was arrested by ONUPD unlawfully when he peacefully protested the unlawful suspension on 03/27 (2015), on December 1st 2015 he was effectively acquitted by a Jury. The Plaintiff served close to five months of false imprisonment as result of Millersville University and Lancaster County actions.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Emotional Distress, Lost of Trust, these events stole me and my family. My reputation is impacted negatively, I was suspended by a University but the suspension is unlawful. My happiness and liberty suffers. The Plaintiff suffered emotional distress, and lost opportunity while sitting in jail unlawfully. Defendants caused great pain and suffering to Carroll. Defendant Millersville University Committed Fraud onto Carroll's Student Record.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I pray this Honorable Court ORDER Millersville University of PA to disclose to him absolutely all of his Student Records pursuant FERPA (20 U.S.C. § 1232g; 34 CFR Part 99).

I'm asking for \$10 Million Dollars in total for monetary compensation, for the defendants actions and inaction that violated my God Given Constitutional Rights. I spent alot of time in jail, the University suspended me before a Hearing. I have electronic recorded evidence I did nothing but ask for my Student Records. I can prove they intentionally violated the law and my constitutional rights. Millersville University committed fraud.

I will like to have a Jury trial.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25th day of March, 20 16.

Signature of Plaintiff Arts Annell

Mailing Address 7044 Greenwood Ave
Upper Darby, PA 19082

Telephone Number 610-701-1782

Fax Number (if you have one) N/A

E-mail Address accarrol@millersville.edu

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____